

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	Case No. 15-mj-07218-JCB
RAZA ALI, et al.	)	
	)	
	)	

**UNOPPOSED MOTION OF DEFENDANT RAZA ALI  
TO EXTEND TIME TO POST BOND**

Defendant Raza Ali, through his undersigned counsel, respectfully moves this Court for an extension of the time to post bond with the Court. In support of this Motion, Mr. Ali states as follows:

1. On December 21, 2015, this Court entered an Order setting the conditions of Mr. Ali's release, which included a \$250,000 bond secured by real property, with bond to be posted with the Court by December 31, 2015. Upon the parties' motion, the Court thereafter entered an Order extending the time for Mr. Ali to post bond, up to and including January 7, 2016.

2. Counsel for Mr. Ali and Assistant United States Attorney Stephen P. Heymann are engaged in discussions to determine whether the parties can reach an agreement to seek the Court's approval of a modification of Mr. Ali's conditions of release, removing the requirement for the posting of security for the appearance bond. A short extension of time will allow the parties to have these discussions, to determine whether agreement can be reached, and to present any motion for modification to the Court.

3. Counsel for Mr. Ali has conferred with Assistant United States Attorney Stephen P. Heymann, who, on behalf of the government, does not oppose the relief sought in this motion.

WHEREFORE, Defendant Raza Ali respectfully requests that this Court modify the Order setting the conditions of Mr. Ali's release to extend the time for his posting of bond up to and including January 21, 2016.

Dated: January 7, 2016

Respectfully submitted,

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo (BBO #564879)

SIDLEY AUSTIN LLP

60 State Street, 36th Floor

Boston, Massachusetts 02109

Ph: (617) 223-0330

[jpirozzolo@sidley.com](mailto:jpirozzolo@sidley.com)

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)**

Pursuant to Local Rule 7.1(a)(2), counsel for Defendant Raza Ali conferred with Assistant United States Attorney Stephen P. Heymann, who, on behalf of the government, does not oppose the relief sought in this motion.

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, January 7, 2016, I electronically filed the above Assented-To Motion of Defendant Raza Ali to Extend Time to Post Bond using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo